

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION**

**This Document Relates To:**

**THE DEALERSHIP CLASS ACTION**

MDL No. 2817

Case No. 18-cv-00864

Honorable Robert M. Dow, Jr.  
Magistrate Judge Jeffrey T. Gilbert

Demand for Jury Trial

**DEALERSHIP PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

1. Plaintiffs ACA Motors, Inc. d/b/a Continental Acura; Baystate Ford Inc.; Cherry Hill Jaguar; Cliff Harris Ford, LLC d/b/a Warrensburg Ford; Continental Autos, Inc. d/b/a Continental Toyota; Continental Classic Motors, Inc. d/b/a Continental Autosports; 5800 Countryside, LLC d/b/a Continental Mitsubishi; HDA Motors, Inc. d/b/a Continental Honda; H & H Continental Motors, Inc. d/b/a Continental Nissan; Gregoris Motors, Inc.; Hoover Automotive, LLC d/b/a Hoover Dodge Chrysler Jeep of Summerville; JCF Autos LLC d/b/a Stevens Jersey City Ford; Jericho Turnpike Sales LLC d/b/a Ford & Lincoln of Smithtown; Jim Marsh American Corporation d/b/a Jim Marsh Mitsubishi Suzuki Kia Mahindra; John O'Neil Johnson Toyota, LLC; Kenny Thomas Enterprises, Inc. d/b/a Olathe Toyota; Marshall Chrysler Jeep Dodge, LLC d/b/a Marshall Chrysler Jeep Dodge Ram; Naperville Zoom Cars, Inc. d/b/a Continental Mazda; NV Autos, Inc. d/b/a Continental Audi; Patchogue 112 Motors LLC d/b/a Stevens Ford; Pitre Imports, LLC d/b/a Pitre Kia; Pitre, Inc. d/b/a Pitre Buick GMC; Teterboro Automall, Inc. d/b/a Teterboro Chrysler Dodge Jeep Ram; Waconia Dodge, Inc. d/b/a Waconia Dodge Chrysler Jeep Ram; and Warrensburg Chrysler Dodge Jeep, L.L.C. d/b/a Warrensburg Chrysler Dodge Jeep Ram Fiat (collectively, "Dealership Plaintiffs") and defendants CDK

Global, LLC and The Reynolds and Reynolds Company (collectively, “Defendants”) reached agreement concerning the Defendants’ need for confidentiality of certain information produced in connection with this litigation. Thereafter the Court entered the parties’ agreed protective order. (ECF No. 104).

2. Dealership Plaintiffs’ Consolidated Class Action Complaint, including its exhibits, contains information that has been designated “confidential,” “highly confidential,” and “for attorneys’ eyes only.” Consequently, Dealership Plaintiffs’ Consolidated Class Action Complaint may not be filed, *in toto*, in the public docket, and must be filed under seal.

Wherefore, Dealership Plaintiffs seek entry of an Order permitting Dealership Plaintiffs’ leave of court to file Dealership Plaintiffs’ Consolidated Class Action Complaint under seal, including its exhibits.

Dated: June 4, 2018

Respectfully submitted,

/s/ Shannon M. McNulty

Shannon M. McNulty

Robert A. Clifford

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**CERTIFICATE OF SERVICE**

I, Shannon M. McNulty, an attorney, hereby certify that on June 4, 2018, I served the above and foregoing **Dealership Plaintiffs' Motion to File Under Seal** by causing a true and accurate copy of such papers to be filed and served on all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Shannon M. McNulty

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